

PISANELLI BICE
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

1 JAMES J. PISANELLI, State Bar No. 4027

JJP@pisanellibice.com

2 TODD L. BICE, State Bar No. 4534

TLB@pisanellibice.com

3 DEBRA L. SPINELLI, State Bar No. 9695

DLS@pisanellibice.com

4 PISANELLI BICE PLLC

5 400 South 7th Street

Las Vegas, NV 89101

6 (702) 214-2100

7 BRAD D. BRIAN

Pro hac vice admitted

8 MICHAEL R. DOYEN

Pro hac vice admitted

9 DANIEL B. LEVIN

Pro hac vice forthcoming

10 BETHANY W. KRISTOVICH

Pro hac vice admitted

12 MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

13 Los Angeles, CA 90071-3426

(213) 683-9100

14 brad.brian@mto.com

15 *Attorneys for Defendants MGM Resorts International,*

16 *Mandalay Bay, LLC, Mandalay Resort Group,*

MGM Resorts Festival Grounds, LLC, and

17 *MGM Resorts Venue Management, LLC*

18
19 UNITED STATES DISTRICT COURT

20 DISTRICT OF NEVADA

22 RACHEL SHEPPARD, *et al.*,

23 Plaintiffs,

24 vs.

25 Mandalay Bay, LLC, f/k/a

Mandalay Corp., *et al.*,

26
27 Defendants.

No. 2:18-cv-01120-RFB-VCF

**DEFENDANTS' UNOPPOSED MOTION
TO STAY AND/OR EXTEND TIME TO
RESPOND TO ORDER ON MOTION TO
REDACT AND SEAL [ECF NO. 87]**

1 Defendants MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group,
2 MGM Resorts Festival Grounds, LLC, and MGM Resorts Venue Management, LLC (collectively
3 “MGM”) hereby move pursuant to Fed. R. Civ. P. 6(b) for an order staying and/or extending the
4 time to respond to the Court’s Order on MGM’s Motion to Redact and Seal [ECF No. 87] (the
5 “Sealing Order”) as good cause exists to extend the time for MGM to file a renewed motion to
6 redact given the current stay of this action. MGM has advised Plaintiffs’ counsel of this Motion
7 and Plaintiffs’ counsel has indicated they do not oppose the requested relief.

8 On October 26, 2018, Plaintiffs and MGM entered into a Stipulation and [Proposed] Order
9 Regarding Stay Pending Mediation [ECF NO. 81] (the “Stipulation to Stay”) seeking to stay all
10 proceedings in this action pending a mediation between the parties. (*See* ECF No. 81, p. 2.) The
11 Court granted the stipulation that same day. (*Id.*, p. 4.) At this time, no party has sought to
12 revoke the stay.

13 On November 28, 2018, the Court issued the Sealing Order, denying, without prejudice,
14 MGM’s request to redact the M.G. and A.P. declarations filed in support of their Supplemental
15 Brief in Support of Opposition to Plaintiffs’ Motion to Remand. (*See* ECF No. 87, pp. 3-4.)
16 Additionally, the Court temporarily suspended the unsealing of the M.G. and A.P. declarations to
17 provide MGM with the opportunity to renew its motion to redact. (*Id.*) The new deadline set by
18 this Court’s Sealing Order is December 14, 2018. (*Id.*)

19 As set forth in the Stipulation to Stay [ECF No. 81], the parties are moving forward with a
20 mediation and seek to avoid the time and expense of further proceedings, pending the resolution
21 of such a mediation. As such, good cause exists to stay and/or extend the time for MGM to
22 comply with the Sealing Order [ECF No. 87]. As such, MGM requests that the deadline to file
23 any renewed motion to redact be extended to fourteen (14) days after the stay in this action is

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1 lifted. Additionally, in order to properly effectuate the requested relief, MGM seeks to have the
2 M.G. and A.P. declarations remain sealed pending further order of this Court.

3 DATED this 10th day of December 2018.

4 PISANELLI BICE PLLC

5 By: /s/James J. Pisanelli

6 JAMES J. PISANELLI, Bar No. 4027
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15 Los Angeles, CA 90071-3426

16 *Attorneys for Defendants MGM Resorts*
17 *International, Mandalay Bay, LLC, Mandalay Resort*
18 *Group, MGM Resorts Festival Grounds, LLC, and*
19 *MGM Resorts Venue Management, LLC*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Pisanelli Bice PLLC, and that on this 10th day of December, 2018, I caused to be e-filed/e-served through the Court's website true and correct copies of the above and foregoing **DEFENDANTS' UNOPPOSED MOTION TO STAY AND/OR EXTEND TIME TO RESPOND TO ORDER ON MOTION TO REDACT AND SEAL [ECF NO. 87]** to all parties in accordance with the CM/ECF service list.

/s/ Christi Colucci

An employee of Pisanelli Bice PLLC

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